

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JUN 30 2015

Clerk of Court

United States of America )  
 1 - Alberto DUARTE-Aguilar )  
       YOB: 1968 Citizenship: Mexico )  
 2 - Guillermo Alfredo PEREZ-Pagaza )  
       YOB: 1977 Citizenship: Mexico )

Case No.

M-15-1056-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 29, 2015 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

18 U.S.C. § 1028(a)(3) &amp; (b)(1)(B)

Knowingly possessed with intent to use unlawfully or transfer unlawfully five or more false identification documents.

18 U.S.C. § 371

Conspiracy to violate federal laws.

This criminal complaint is based on these facts:

See Attachment

Continued on the attached sheet.



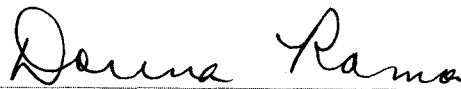
Complainant's signature

Maria Christela Bernal, HSI Special Agent

Printed name and title



Sworn to before me and signed in my presence.

Date: 6/30/2015

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Dorina Ramos

Printed name and title

Attachment

On June 29 2015, an undercover agent (UCA) with Homeland Security Investigations (HSI), Harlingen, Texas, met with Guillermo PEREZ-Pagaza in the McAllen, Texas area regarding the purchase of fraudulent documents. The UCA provided three photos and made a down payment of \$300 on the purchase of three sets of fraudulent documents being sold for \$200 per set, for a grand total of \$600. Each set consisted of one fraudulent legal permanent resident card and one social security card.

After receiving the down payment and photos, PEREZ first met with Alberto DUARTE-Aguilar to deliver the photos and money. PEREZ met with DUARTE a second time to receive the completed documents. PEREZ and DUARTE were arrested after HSI Special Agents witnessed the transfer of documents from DUARTE to PEREZ. Post Miranda, both PEREZ and DUARTE admitted to being involved in the sale of fraudulent documents. A subsequent search of DUARTE's residence resulted in the seizure of various fraudulent documents and document-making paraphernalia. DUARTE further admitted to making fraudulent documents.